Venture Partner Consultation and General Services LLC Privacy Notice

1. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it in order to provide the Services to you. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

This Privacy Notice may be updated and/ or re-issued at any time, and we will provide you with notice of any such updates via either email and/or our Website.

2. What Personal Data is

'Personal Data' is any information relating to an identified natural person or to a natural person who can be identified, directly or indirectly, by reference to an identifier such as a name, voice, photo, an identification number, an online identifier, location data or to one or more factors specific to the physical, physiological, economic, cultural, or social identity of that natural person.

'Special Category Personal Data' is any information that reveals, either directly or indirectly, a natural person's family, racial origin, political, philosophical, or religious beliefs, criminal records, biometric data, or any information concerning the health of such person, including the physical, psychological, mental, genetic, or sexual status of such person, including the provision of health care services, which reveals information about his or her health status. For the avoidance of doubt, Sovereign may require and/or need to process your sensitive personal data in order to provide you with the Services.

3. Personal Data we collect

The Personal Data we collect about you will be the minimum necessary to provide the Services. The type of Personal Data we collect is outlined in the table below in the section entitled 'Purposes, lawful bases and retention periods'.

4. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone including but not limited to any information exchanged over any private messaging application, text or email and/or via our website.

5. Cookies

A cookie is a small text file which is placed onto your device (e.g computer, smartphone or other electronic device) when you use our website.

Our website uses cookies. For further information about cookies and how we use them, please see our Cookie Notice.

6. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Client	A. Identity information - Name, nationality, date of birth, your residency status in Qatar (if applicable) etc.	To be able to identify you as a unique individual and to facilitate the starting of the business relationship.	Compliance with legal obligation	It is our normal practice to retain documents relating to our engagement as prescribed in the local Qatari regulations (which is ten years (10) from the end of the client relationship, depending on the jurisdiction in which you are incorporated or registered) from the end of the relevant Service.
	B. Contact information – Your home address, your phone number, your personal email address etc.	To be able to contact you in relation to the Services and provide updates, newsletters, updates to the local laws. Furthermore, we are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.	Compliance with legal obligation	
	C. Employment information – Your employer's details, i.e name and address, your business establishment's name and email address etc.	We are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.	Compliance with legal obligation	
	D. Commercial/Financial information – Sources	We are required to request and maintain this information to satisfy	Compliance with legal obligation	

	of income and your record of investments, your salary with the benefits and allowances and your bank account details. E. Documentation related - Including copies of your passport, QID, address proofs etc.	the Know Your Client (KYC) requirements. To verify that the identity information provided are accurate and to satisfy the Know Your Client (KYC) requirements.	Compliance with legal obligation	

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our Services without the required information.

7. Marketing

We would like to send you information about our products and services, events and news, which may be of interest to you. Where we have your consent or it is in our legitimate interest to do so, we may do this by email, telephone or social media.

You can unsubscribe at any time by:

- contacting us at info@sovereigngroup.com
- using the 'unsubscribe' link in emails.

You also have the right to object to your personal data being used for direct marketing purposes at any time.

For more information on how we use your personal data for marketing purpose, please see our Marketing Privacy Notice.

8. Sharing your Personal Data

In the course of providing you with this Service – we may need to share your Personal Data with the following third parties:

a) Our affiliates, where necessary for the purpose of providing the Services.

b) Certain service providers we have retained in connection with the Services we provide, such as translators or other necessary entities.

c) Certain service providers while we carry out searches regarding you, using the relevant platforms.

d) For legal purposes, including but not limited to regulators for the purposes of processing your application, and other governmental authorities.

e) During the course of your relationship with us, we may have to carry out certain legal obligations such as money laundering and terrorist financing checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared.

7. Retention

We have implemented robust IT management systems, such as One Viewpoint, to ensure the security of our data. These systems adhere to recognized standards, providing a comprehensive framework for safeguarding information and maintaining a secure operational environment to protect personal information from loss, misuse, alteration or destruction.

We will retain your personal data for as long as is necessary, and specifically in accordance with the table set out above, to provide the Services which you have requested from us.

It is our normal practice to retain documents relating to our engagement as prescribed in the local regulations (which is ten (10) years) from the end of the relevant Service.

However, we may need to retain some records for a longer period where this is required for us to be able to comply with our legal obligations.

We may also need to retain your personal data for a longer period where this is required in relation to legal claims, although this is rare.

Upon termination or expiry of the relevant period, we securely erase your personal data in accordance with the Qatar Data Protection legislation.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

8. International Transfers

Your personal data may be shared within the Sovereign Group. This may include transferring your personal data to other Group offices.

We may also share your personal data with 3rd party service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

9. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
  You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.

- **Right of access** (commonly known as a “Subject Access Request”)
  You have the right to receive a copy of the Personal Data we hold about you.

- **Right to rectification**
  You have the right to have any incomplete or inaccurate information we hold about you corrected.

- **Right to erasure** (commonly known as the right to be forgotten)
  You have the right to ask us to delete your Personal Data.

- **Right to object to processing**

  You have the right to object to us processing your Personal Data.

- **Right to restrict processing**

  You have the right to restrict our use of your Personal Data.

- **Right to portability**

  You have the right to ask us to transfer your Personal Data to another party.

- **Automated decision making**

  You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

- **Right to withdraw consent**

  In the limited circumstances where you may have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis or legal requirement for doing so.

- **Right to lodge a complaint**

  You have the right to lodge a complaint with the National Cyber Governance and Assurance Affairs (NCGAA) of the National Cyber Security Agency / the Ministry of Transport and Communications, if you believe SPPGQ is infringing the data protection laws or you are concerned about the way in which we are handling your personal data.

  The supervisory authority in the State of Qatar is the NCGAA / the Ministry of Transport and Communications. You can find further contact details on their website Contact Us | National Cyber Governance and Assurance Affairs (qcert.org)

  National Cyber Governance and Assurance Affairs,

  National Cyber Security Agency (NCSA),

  P.O. Box 24100,

  Wadi Al Sail Street,

Doha, Qatar

Email: assurance@ncsa.gov.qa

Or by telephone on (+974) 2362220

How to exercise your rights

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

10. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact our Data Protection Officer as follows:

dpo@Sovereigngroup.com

11. Changes to this privacy notice

Venture Partner Consultation and General Services LLC keeps this privacy notice under regular review. We will inform you of any substantial change in how we process your personal data which will be updated on Sovereign's web page.

This privacy policy was last updated in May 2025.